

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA :
:
v. : 1:20CR208-1
:
ALEXANDER HILLEL TREISMAN :

MOTION FOR EXTENSION OF TIME

NOW COMES the United States of America, by and through Matthew G.T. Martin, the United States Attorney for the Middle District of North Carolina, hereby files this Motion for Extension of Time in which to file a response to the Defendant's Motion to Suppress and states the following:

1. Pretrial motions were due by January 13, 2020 with responses due on January 20, 2021.
2. The defendant filed a Motion to Suppress on January 13, 2020. The Government's response to this motion is due January 20, 2021.
3. Monday, January 18, 2021 was a federal holiday.
4. One of the Government's attorneys in this matter was on military leave last Thursday and Friday, and is on military leave today, Wednesday, January 20, 2021.

5. Both attorneys for the Government in this matter have also been addressing other matters outside of their regular workflow during the past week.

6. The defendant's Motion to Suppress raises an issue related to ordinances of the Kannapolis City Code, policies (operating procedures) of the Kannapolis Police Department, and sections of the North Carolina General Statutes, all pertaining to the towing and removal of the defendant's van from a bank parking lot. The Government requires additional time to review and research the issue and authorities raised by the defendant's motion.

7. Counsel for the defendant, Samuel J. Randall, IV, has been contacted and has no objection to the request.

WHEREFORE, the Government respectfully requests that the deadline for filing a response to the defendant's Motion to Suppress be extended until Friday, January 29, 2021.

This, the 20th day of January, 2021.

Respectfully submitted,

/S/ MATTHEW G.T. MARTIN
UNITED STATES ATTORNEY

/S/ GRAHAM T. GREEN
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CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2021, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Samuel J. Randall, IV, Esquire

/S/ GRAHAM T. GREEN
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